

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA	§	
	§	
vs.	§	CASE NO. 2:21-CR-25
	§	
BART WADE REAGOR	§	

**DEFENDANT’S UNOPPOSED MOTION TO ENLARGE TIME FOR
FILING OBJECTIONS TO THE PRESENTENCE REPORT**

The Defendant, through counsel, requests this Court to enlarge for a period of seven (7) days, to and including January 10, 2022, the time to file objections to the Presentence Report. He shows the following:

1. On Monday, December 20, 2021, the US Probation Office filed its draft presentence report. Objections to the report are accordingly due on January 3, 2022.

2. The draft report is 51 pages long and encompasses, as “relevant conduct,” the activities of Mr. Reagor’s business associates, for which he was never indicted. By including the floorplan fraud/check-kiting of these 15 other people, the report magnifies Mr. Reagor’s criminal exposure to a range of 324 to 405 months’ imprisonment.

3. Given the length of this report and the grave prison exposure, counsel is unsurprisingly forced to research, draft, and file significant objections. Defense accordingly requests an extra seven days, in the interest of justice and in light of the holiday season in which this draft report was filed.

4. Defense and government counsel have conferred regarding this extension. The government is unopposed, and asks the Court to extend any other, related deadlines by seven days as well.

5. The requested enlargement should not present any risk of delaying the sentencing proceeding. Sentencing is currently set for February 24, 2022.

6. For these reasons, the Defendant requests that the Court enlarge for seven (7) days from the current January 3, 2022, deadline to and including January 10, 2022, the time for filing any PSR Objections.

Respectfully submitted,

JONES WALKER LLP

/s/ **Dan L. Cogdell**

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF CONFERENCE

I certify that on December 26, 2021, I conferred with government counsel Jeffrey Haag, who is unopposed to the foregoing.

/s/ *Dan L. Cogdell*

CERTIFICATE OF SERVICE

I certify that on December 27, 2021, I filed this Motion via the Electronic Filing System for the Court, which served electronic notice of filing upon all parties.

/s/ *Dan L. Cogdell*